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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 96-259
Table of Allotments,)	RM-8970
FM Broadcast Stations.)	
(Moscow, Idaho))	

REPLY COMMENTS

To: The Chief, Allocations Branch

Darin L. Siebert ("Siebert"), by his consultant, hereby submits Reply Comments in the above-captioned proceeding.

Siebert is the proponent for the allocation of FM Channel 277A at Moscow, Idaho. Upon affidavit of Siebert, supported by the technical exhibits of his consultant, the Commission announced its intent to allocate the channel.

In his Comments, Siebert reaffirmed his intention to file for the channel, if allocated and construct promptly upon Grant.

Also filing Comments and Counterproposals are Radio Palouse, Inc. ("RPI") and Rook Broadcasting of Idaho, Inc. ("Rook").

RPI proposes Channel 277A be allotted to the community of Troy, Idaho, in lieu of Moscow, Idaho. RPI also states that it will apply for the channel, if allocated. We would point out that RPI is the licensee of KHTR-FM/KQQQ-AM in Pullman, Washington. Pullman is located less than 10 miles from Moscow, Idaho. RPI has also filed an application for Channel 249A at Pullman. In addition, the community of Troy, Idaho is located only 10 miles from Moscow, Idaho.

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If RPI truly wishes to serve the community of Troy, Idaho with a new FM broadcast facility, we would propose that the Commission allot FM Channel 262A for that purpose. As shown by our Exhibit A, Channel 262A can be allotted to Troy, Idaho.

THEREFORE, we would respectfully request that the Counterproposal of RPI, with regard to the allotment of Channel 277A to Moscow, Idaho be DENIED.

In its Counterproposal and Comments, Rook's instant counterproposal would propose to allot Channel 276C1 to Post Falls, Idaho, delete Channel 276C2 at Coeur d'Alene, Idaho, and DENY the proposed Channel 277A at Moscow, Idaho. Rook commissioned Michael W. Radovich, P.E., a consulting engineer with impeccable credentials, to conduct a technical study with regard to the viability of the co-existence of the proposed Channel 277A at Moscow, Idaho and the proposed Channel 276C1 at Post Falls, Idaho. We agree with the findings of Mr. Radovich, in that, on the surface, both proposals would appear to be mutually exclusive. However, we submit that, although this is a matter that should be resolved in the 301 stage, the potential short-spacing problem could be addressed by the utilization of a directional antenna by either or both proponents. Or, through Special Negotiated Short-Spacing Agreement.

We would also submit that the Rook Counterproposal would result in Rook abandoning its primary city of license of Coeur d'Alene, Idaho for the small community of Post Falls, Idaho. It should be noted that Post Falls, Idaho, located geographically between Coeur d'Alene, Idaho and Spokane, Washington, is well served by numerous broadcast services.

THEREFORE, we would respectfully request that the instant comments and counterproposal of ROOK, with regard to the allocation of Channel 276C1 at Post Falls,

Idaho be DENIED.

In sum, Darin L. Siebert filed a Petition for Rulemaking to have Channel 277A allotted to Moscow, Idaho as that community's second commercial FM allotment. The Commission proposed allocating the channel. Opponents RPI and Rook submitted Counterproposals in this Matter. We respectfully submit that the public interest would be served with the allocation of Channel 277A to Moscow, Idaho.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Keith E. Lamonica', with a long horizontal line extending to the right.

Keith E. Lamonica
1710 Turner Dr.
Pullman, WA. 99163
(509) 332-2604

Consultant for
Darin L. Siebert.

March 1, 1997

Exhibit A

Allocation Study
Troy, Idaho.

Search Coordinates:

North 46-42-13, West 116-38-53

Channel 262A6 (100.3 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEAR
KEWUFM	Cheney	WA	208	C1	L	67.7	13.0	333.2ø	54.7
KWWS	Walla Walla	WA	209	C2	C	88.1	8.7	235.7ø	79.4
KXLYFM	Spokane	WA	260	C	L	86.9	59.0	345.4ø	27.9
ALC	Spokane	WA	260	C	U	86.9	59.0	345.4ø	27.9
KWRL	La Grande	OR	260	C1	C	121.6	46.6	212.4ø	75.0
ALC	La Grande	OR	260	C1	U	117.3	46.6	217.1ø	70.7
KZOQFM	Missoula	MT	261	C1	L	127.2	82.6	86.9ø	44.6
KWRL	La Grande	OR	261	A	L	117.3	44.7	217.1ø	72.6
ALC	Missoula	MT	261	C1	U	127.2	82.6	86.9ø	44.6
NEW-T	Spokane, etc.	WA	262	D	A	71.2	0.0	333.9ø	71.2
ALC	Payette	ID	262	C1	U	182.8	124.3	184.0ø	58.5
ALC	Moses Lake	WA	262	C1	U	125.8	124.3	282.7ø	1.5
KWIQFM	Moses Lake	WA	262	C1	L	125.8	124.3	282.7ø	1.5
CBRMFM	Creston	BC	262	B		170.1	138.6	359.5ø	31.5
KQXR	Payette	ID	262	C1	L	198.9	124.3	178.0ø	74.6
ALC	Walla Walla	WA	264	C3	U	102.8	26.1	239.4ø	76.7
NEW	Wallace	ID	264	C	A	70.4	59.0	32.6ø	11.4
KHSS	Walla Walla	WA	264	C3	C	88.1	26.1	235.7ø	62.0
K265AP	Lewiston	ID	265	D	L	24.2	0.0	226.4ø	24.2
KHSS	Walla Walla	WA	265	A	L	92.0	19.3	241.5ø	72.7

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Lamonica 3/1/97

CERTIFICATE OF SERVICE

I, Keith E. Lamonica, do hereby certify that copies of the foregoing REPLY COMMENTS of Darin L. Siebert have been sent via first class United States mail, postage pre-paid, this 1st day of March, 1997 to:

Radio Palouse, Inc. (RPI)
P.O. Box 1,
Pullman, WA. 99163

Rook Broadcasting of Idaho, Inc.
22E. 2211 Sprauge
Spokane, WA. 99202


Keith E. Lamonica